



May 11, 2025

MEMO ENDORSED

Via Electronic Filing

United States District Judge
Hon. Valerie E. Caproni
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

USDC SDNY
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RE: Johnson v. J&N Construction Group Corp., et al.
Docket No.: 1:24-cv-07857

Dear Judge Caproni,

I represent Plaintiff in the referenced matter. Plaintiff respectfully requests that the Court compel Defendant J&N Construction Group Corp. (“J&N”) to submit their discovery responses to Plaintiff’s first set of document demands and interrogatories. Defendant J&N’s discovery responses are significantly overdue and remain outstanding further detailed below.

On March 5, 2025, I served Plaintiff’s first set of document demands, interrogatories and a notice of depositions upon Defendant J&N’s counsel. On April 3, 2025, I emailed defense counsel seeking Defendant J&N’s outstanding discovery responses. On or about April 4, 2025, defense counsel and I had a telephone call where defense counsel requested a two-week extension to submit J&N’s discovery responses, which I consented to. On April 21, 2025, I again emailed defense counsel seeking Defendant J&N’s outstanding and overdue discovery responses. On April 21, 2025, defense counsel emailed me that she had been sick the week prior and anticipated submitting J&N’s discovery responses that week. On April 28, 2025, I emailed defense counsel, “. . . I really need the discovery this week so that we can keep on schedule. Please advise. . . .” I did not receive a response, so on May 1, 2025, I emailed defense counsel again stating, “Can you please let me know when you expect to send the outstanding discovery? I will have to seek judicial intervention otherwise.” On May 8, 2025, I emailed defense counsel a final time stating, “I really

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need the discovery production this week to ensure we can complete discovery within the schedule. I will have to seek judicial intervention otherwise. . . .” Defense counsel did not respond.

To date, Defendant J&N has wholly failed to respond to Plaintiff’s March 5, 2025, discovery requests, greatly prejudicing Plaintiff. Accordingly, Plaintiff respectfully requests that the Court compel Defendant J&N to submit responses to Plaintiff’s discovery requests immediately to allow the Parties to comply with the Court’s discovery schedule. Should Defendant J&N continue to delay discovery, Plaintiff reserves the right to seek an extension to the discovery schedule from the Court and will submit an update as needed.

We thank the Court for its time and attention to this matter.

Application DENIED. The Court expects the parties to work together professionally and collegially to complete discovery by the deadline. The parties are required to meet and confer in person for at least 90 minutes by May 16, 2025. If after meeting in person, the parties have not resolved their issues, then they should contact the Court in accordance with the Undersigned's Individual Rule 3(B).

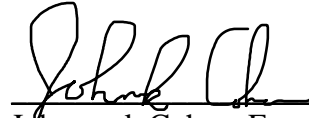
SO ORDERED. 5/12/25



HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

Sincerely,

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